

Hans W. Kernkamp, General Manager-Chief Engineer

June 2, 2005

John Robertus - Executive Officer California Regional Water Quality Control Board - San Diego Region 9174 Sky Park Court, Suite 100 San Diego, CA 92123-4340

RE: Anza Sanitary Landfill - Tentative Addendum No. 2 to Order No. 93-86 LDU: 06-0204.02:agrove

Dear Mr. Robertus:

The Riverside County Waste Management Department (Department) has received your letter on Addendum No. 2 of Order No. 93-86, dated May 6, 2005. In the findings, Item 2 states the following:

On May 8, 1999, the Anza Sanitary Landfill, Riverside County, stopped receiving wastes for disposal. On February 10, 2003, the Regional Board determined that the County of Riverside submitted a complete Joint Technical Document (JTD) for the closure of the Anza Sanitary Landfill. Therefore, it is appropriate to exclude the Anza Sanitary Landfill from the amendments in this addendum to Order 93-86.

Please clarify whether or not the Anza Sanitary Landfill is subject to all of the requirements of Addendum No. 2. It appears that the Regional Water Quality Control Board (RWQCB) intends for Item 4 (Add the following as §13.(b) 5...) to apply to submittals regarding the Anza Sanitary Landfill. If it is the intent of this addendum to apply to the Anza Sanitary Landfill, the Department requests that the last line be stricken from §13.b(5) of the proposed addendum, or be revised to state the following:

"The Discharger may be required to shall also-continue to provide complete paper copies of submittals all reports to this Regional Board. Regional Board staff shall analyze submittals on a case by case basis to determine if a reasonable need and benefit exists for the submittal of a paper copy and upon the determination that a paper copy is necessary, Dischargers shall be notified of the determination and rationale behind the determination."

The intention of Title 23 CCR §3890 is to replace the requirements for the submittal of paper copies of reports, beginning July 1, 2005, with the exception as provided in Title 23 CCR §3895(b), which states:

"In addition to the electronic submittal of reports required pursuant to this Chapter, a regulatory agency may require the submittal of a report, or portions thereof, in diskette, compact disc, or other form if the agency determines that the alternative form is necessary. The burden including cost, of these alternative forms shall bear a reasonable relationship to the need for alternative form and benefits to be obtained from the alternative form."

The State Water Resources Control Board website also states:

"The electronic copy is intended to replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities."

Page 1 of 2

Please be advised that it is not the intent of the Department to completely discontinue submittal of paper copies. The Department understands that there may be some submittals that paper copies would be appropriate and the Department plans to submit paper copies of all reports for the near future until the Geotracker database and associated electronic reporting has become routine. Title 23 CCR §3890 allows for the Regional Board to request the paper form in addition to the digital submittal, and such requests should not be included as part of the Waste Discharge Requirements (WDR), but rather a separate letter. This will allow the paper copy to be eliminated in the future, if deemed appropriate, without the need for a change to the WDR.

In a voice mail message from John Odermatt of RWQCB staff on June 1, 2005, the RWQCB is preparing a site specific WDR for the Anza Sanitary Landfill. This document is currently in draft form and is expected to go before the RWQCB for approval in September or October of this year. If the RWQCB does not want to make changes to the blanket Order and it is verified that Addendum No. 2 to WDR Order No. 93-86 does not apply to the Anza Sanitary Landfill, revisions to address electronic submittal for the Anza Sanitary Landfill may be included through the anticipated site specific WDR scheduled for adoption this fall.

If you have any questions, please contact me or Anne Ennesser of my staff at (951) 486-3200.

Sincerely,

Hans Kernkamp

General Manager - Chief Engineer

ACMD/AE: acmd/ae PD# 34198v1

cc:

John Odermatt, RWQCB Angela Dufresne Anne Ennesser Andrew Cortez